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Supporting Document No. 6

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California Regional Water Quality Control Board
San Diego Region
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THE PROMENADE AT PACIFIC BEACH

JULY 1994 MONITORING REPORT

DEWATERING DISCHARGE PERMIT
REGIONAL BOARD ORDER NO. 91-10
(NPDES Permit No. CA0108804)

Dear Ms. Ghoram:

On behalf of Promenade, Inc., the former owner of the commercial retail center known as the Promenade at Pacific Beach, I^3 CONSULTING is pleased to provide the following report of discharge monitoring for the month of July 1994. The report consists of this narrative discussion, a summary table of the results of required daily monitoring activities conducted by Promenade staff, a summary table of the laboratory analytical results, and an Appendix consisting of the laboratory reports. According to the monitoring schedule in the discharge permit, this is a monthly monitoring event.

BACKGROUND

The Promenade at Pacific Beach is located at the 4100 block of Mission Boulevard on the west coast of San Diego, California. It consists of a two-story retail shopping center with one level of underground parking. Due to its elevation and proximity to the Pacific Ocean, it has been necessary to construct a subterranean dewatering system beneath the parking garage to collect and remove the groundwater that would otherwise inundate the parking area. The dewatering system discharges to a storm drain that runs beneath Mission Boulevard, and eventually outfalls to Mission Bay.

allowable range for these parameters, for both the "pump sump" sample and the regular "sampling port" sample. None of the listed volatile organic compounds were detected in either sample by EPA Method 8240 (see the lab reports for laboratory quantifiable detection limits for the individual analytes). The lab reports, QA/QC reports and chain-of-custody documentation are included in the Appendix.

As has been reported in previous monitoring reports, for the last three months elevated levels of zinc have been detected in the discharge samples. The following table summarizes the results of zinc analyses since monitoring began in June of 1993:

MONTH	ZINC CONCENTRATION
JUNE 1993	Not Detectable (<50 µg/l)
September 1993	70 µg/L
December 1993	80 µg/L
March 1994	110 µg/L
May 1994	330 µg/L
June 1994	2180 µg/L

Due to the significantly elevated concentration observed in the June sample event, it was decided to attempt to determine the source of this zinc in order to seek a remedy. One possible source was considered to be metallic-alloy wear parts in the aging dewatering pumps. In order to establish if this was indeed the source of the zinc in the dewatering discharge, two samples were collected - one before the water passed through the pumps (pump sump) and another from the regular sampling location (sample port SP), after the pumps. Also, two aliquots from each sample were analyzed: one filtered to detect minute particles or dissolved zinc and one aliquot unfiltered to detect total zinc. The results of these four analyses are given below:

SAMPLE LOCATION	FILTERED?	ZINC CONCENTRATION
Pump Sump	Yes	Not Detected (<50 µg/L)
Pump Sump	No	Not Detected (<50µg/L)
Sample Port	Yes	1750 µg/L
Sample Port	No	1930 µg/L

Under the authority of the U.S. Environmental Protection Agency's (USEPA) National Pollutant Discharge Elimination System (NPDES) and the California Regional Water Quality Control Board's (RWQCB) Order No. 91-10, the RWQCB executive director issued an authorization to discharge on May 7, 1993. Daily monitoring of pH and flow rate, as well as monthly sampling for laboratory analyses has been conducted and reported on a monthly basis since June 1993. This Monitoring Report is submitted in accordance with the monitoring program and reporting schedule specified in Order No. 91-10.

DAILY pH AND FLOW READINGS

A computer spreadsheet has been developed to record the measurements and facilitate the calculations for the daily flowrate and pH monitoring, which is conducted by the maintenance staff at the Promenade. A copy of the form, which includes the daily data as recorded by the maintenance staff at the Promenade as well as monthly minima, maxima and averages, is included as Table 1. The daily flows ranged from 99,960 to 197,880 gallons per day (gpd), with an average of 142,274 gpd. The average daily pH reading was 7.33.

SAMPLING PROCEDURES

On August 3, 1994, Mr. Gary Clossin of I^3 CONSULTING collected two samples of dewatering effluent: (1) a sample from the end of the subterranean groundwater collection pipes in the "pump sump"; and, (2) a sample of the dewatering discharge from the sample port (i.e., after the discharge had passed through the pumps). The samples were placed directly into laboratory-provided, chemically-preserved containers. Care was taken to minimize agitation and eliminate headspace in the appropriate containers. The samples were capped, labeled and secured in a chilled ice chest for direct delivery to Analytical Technologies, Inc. (ATI) in San Diego, California. Chain-of-custody forms are included with the laboratory reports in Appendix A.

RESULTS OF LABORATORY ANALYSES

The results of the laboratory analyses performed on the dewatering discharge samples are summarized in Table 2. Dissolved oxygen and turbidity were well within the

These results indicate that the pumps may be the source of the zinc concentrations. The Promenade, Inc. is obtaining bids for the replacement of the wear parts of the pumps, and plans to replace as much of the pump as is necessary to alleviate the zinc problem.

NEW OWNERSHIP OF THE PROMENADE AT PACIFIC BEACH

During the week of August 15, 1994, the ownership of the Promenade at Pacific Beach changed hands. The new owner is The Promenade Mall Development Corporation. You should have received correspondence to this effect. At the request of the new owner, I^3 CONSULTING will continue the current approved monitoring program.

If you have any questions or comments, please contact either Michael Katz of The Promenade Mall Development Corporation at 497-9097, or myself, as appropriate.

Very truly yours,
I^3 CONSULTING

Gary D. Clossin, R.C.E.

Enclosures: Tables, Laboratory Reports

cc: Michael Katz
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